Certification of CPNI Filing EB-06-TC-060 EB Docket No. 06-36

# ANNUAL CERTIFICATION Customer Proprietary Network Information Procedures of Allband Communications Cooperative

I, Ron K. Siegel, do hereby certify that I have personal knowledge that Allband Communications Cooperative (Allband) has established procedures regarding the Customer Proprietary Network Information related to the subscribers of Allband. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: 1CuZ. Sh

By: Ron K. Siegel

General Manager

Allband Communications Cooperative

#### February 2009

## Certification of CPNI Filing Allband Communications Cooperative

Allband Communications Cooperative ("Allband") hereby submits that its procedures regarding its subscribers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Allband certifies that it protects and utilizes its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009 and does not sell or disclose subscriber CPNI to outside entities. In addition Allband does not disclose nor allow access by others to subscribers' CPNI for the purpose of identifying customers placing calls to competing carriers.

Allband's employees have been educated about CPNI as well as the related federal regulations and Allband's statutory responsibility to its customers. All requests for subscriber CPNI are forwarded to Senior Management personnel and any unauthorized use, sale, or disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket #06-36

### Annual 64.2009(e) CPNI Certification for 2008

Date filed: Monday, February 23rd, 2009

Name of company covered by this Certification: Allband Communications

Cooperative

Form 499 Filer ID: 825885

Name of signatory: Ron Siegel

Title of signatory: General Manager

I, Ron Siegel, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Signed:

Print Name: Ron Siegel

Title: General Manager

Allband Communications Cooperative

Date: Friday, February 20th, 2009

V.Z.S.h

# Statement of Compliance with the FCC's Customer Proprietary Network Information "CPNI" Rules and Regulations

Allband Communications Cooperative's ("Allband") operating procedures certify that Allband is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Allband's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules set forth in 47 U.S.C. 222 and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. 64.2001 through 64.2009.

Allband has taken the steps and has internal procedures in place so as to educate our employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

Any employee that violates Allband's CPNI operating procedures is subject to disciplinary action, up to dismissal.

Allband mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.

Allband has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

Allband Communications Cooperative <u>has not taken</u> any actions against data brokers in the past year regarding any breach of CPNI information.

Allband Communications Cooperative <u>has not received</u> any customer complaints in the past year concerning the unauthorized release of CPNI.